

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL  
COLLECTION AGENCY, INC.  
CUSTOMER DATA SECURITY  
BREACH LITIGATION

*This Document Relates To: All Actions  
Against Quest Diagnostics, Inc. and  
Optum360, LLC.*

Civil Action No. 2:19-md-02904  
(MCA-MAH)

**NOTICE OF MOTION TO SEAL  
CONFIDENTIAL MATERIALS**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that on December 16, 2024, or as soon thereafter as counsel may be heard, counsel for Defendants Optum360, LLC (“Optum360”) and Quest Diagnostics Incorporated (“Quest”) (collectively, “Defendants”) shall move before the Honorable Michael A. Hammer, U.S.M.J., at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50, pursuant to Local Civil Rule 5.3(c), for an Order sealing the following documents or portions thereof:

- Special Master Discovery Order and accompanying transcript (Dkt. No. 742);

**PLEASE TAKE FURTHER NOTICE** that there is no dispute regarding the portions of the above-mentioned documents that Defendants seek to maintain under seal.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to L. Civ. R. 5.3(c)(2)(i), the Parties have conferred in an effort to narrow or eliminate the materials or information that are the subject of this Motion.

**PLEASE TAKE FURTHER NOTICE** that Defendants shall rely upon the accompanying Declaration of Heather Benzmilller Sultanian and Declaration of Donald Houser with Index annexed thereto. No brief is necessary in accordance with L. Civ. R. 5.3(c)(1).

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